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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 31, 1993

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: ET Docket No. 92-255, RM-7903

Dear Ms. Searcy:

Enclosed please find the original and nine copies of the Reply of the National Electrical Manufacturers Association with respect to the above-referenced matter.

Should there be any questions concerning this matter, please do not hesitate to contact the undersigned.

Yours very sincerely,

Lawrence J. Movshin

LJM/att
Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In The Matter Of	)	
	)	
Amendment of Part 18 to	)	
Remove Unnecessary Regulations	)	**ET Docket No. 92-255**
Regarding Magnetic Resonance	)	RM-7903
Systems	)	
	)	

To: The Commission

REPLY OF THE
NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION

The Magnetic Resonance Section of the National Electrical Manufacturers Association ("NEMA"), by its attorneys and pursuant to Commission Rule §1.415 hereby replies to the five other comments filed in response to the Commission's Notice of Proposed Rulemaking in the above-referenced proceeding (FCC 92-492, released December 7, 1992) (the "NPRM"). There was a rare level of unanimity among **all** of the commenting parties[1/] that the proposed rules will serve the public interest by removing the burden of unnecessary regulation from Magnetic Resonance systems without material risk of interference to other spectrum users.

Presented with similar circumstances in the past, the agency has provided appropriate exemptions for other Part 18 devices from burdensome testing and reporting requirements, tailoring the level of regulatory requirements to the particular situation at hand.[2/] A

1/ Comments were filed by NEMA and by the Association of Maximum Service Television, Inc. ("AMST"), Philips Medical Systems, Hitachi Medical Systems America, Inc., Siemens Medical Systems, Inc., GE Medical Systems and the American College of Radiology.

2/ See e.g., the Commission's action in Docket 85-303 exemption medical ultrasonic equipment from most of the Part 18 requirements (1 FCC Rd 553)(1986). AMST, while recognizing the benefit of the proposed exemption for MR systems, has objected to the ad hoc nature of the agency's treatment of Part 18 devices. and has

similar exemption from the testing and reporting requirements of the Part 18 regulations is entirely appropriate for MR Systems. The Commission can reasonably, and should, rely on its authority to require any operator of an MR system that may be creating objectionable interference to correct such problem as the appropriate protection mechanism for this industry. NEMA therefore joins with the other commenting parties in urging swift adoption of the rules proposed in the NPRM.

Respectfully submitted,

THE NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION

[redacted]

CERTIFICATE OF SERVICE

I, Angelia T. Torres, hereby certify that a copy of the foregoing Reply Comments of The National Electrical Manufacturers Association has been served via first-class mail, postage prepaid this 31st day of March, 1993 to the following:

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Angelia T. Torres

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